

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

JOHN DOE,	)	CASE NO. 1:22-cv-11540-NMG
	)	
Plaintiff,	)	JUDGE NATHANIEL M. GORTON
v.	)	
MASSACHUSETTS INSTITUTE OF	)	MAGISTRATE JUDGE PAUL G.
TECHNOLOGY,	)	LEVENSON
	)	
Defendant.	)	

**STIPULATION AND MOTION FOR EXTENSION OF TIME FOR DEFENDANT TO  
RESPOND TO PLAINTIFF'S COMPLAINT AND MOTION TO PROCEED UNDER  
PSEUDONYM**

Pursuant to Fed. R. Civ. P. 6(b)(1)(A), Plaintiff John Doe (“*John*” or “*Plaintiff*”) and Defendant Massachusetts Institute of Technology (“*MIT*” or “*Defendant*”) (together, the “*Parties*”) hereby stipulate and jointly move this Court to extend Defendant’s deadline to answer or otherwise respond to Plaintiff’s Complaint up to and including **Tuesday, December 20, 2022**. The Parties further stipulate and jointly move this Court to extend Defendant’s deadline to respond to Plaintiff’s Motion to Proceed Under Pseudonym up to and including **Tuesday, December 20, 2022**. The Parties make these requests in good faith and not for purposes of delay.

In support thereof, the Parties aver that Defendant has agreed to waive service in this matter. Further, the Parties have begun to communicate in good faith about possible pathways to resolve or narrow the disputes in this case without further litigation, and the Parties believe this extension will aid the Parties in these efforts. A Proposed Order granting the relief requested is submitted with this motion.

**LOCAL RULE 7.1 CERTIFICATION**

The Parties have conferred and jointly request the relief sought in this motion.

**CERTIFICATE OF SERVICE**

The undersigned hereby certify that on this 23rd day of September, 2022, a true and correct copy of the foregoing was filed through the ECF System, which will be sent electronically to the registered participants as identified on the Notice of Electronic Filing, and paper copies will be served upon anyone indicated as a non-registered participant.

Dated: September 23, 2022

Respectfully submitted,

*/s/ Susan C. Stone*

Ruth O'Meara-Costello (BBO #667566)  
ZALKIND DUNCAN & BERNSTEIN LLP  
65 Atlantic Avenue  
Boston, Massachusetts 02110  
P: (617) 742-6020  
F: (617) 742-3269  
E: rcostello@zalkindlaw.com

Susan C. Stone  
Kristina W. Supler  
KOHRMAN JACKSON & KRANTZ, LLP  
1375 E. 9<sup>th</sup> Street, 29<sup>th</sup> Floor  
Cleveland, OH 44114  
P: (216) 696-8700  
F: (216) 621-6536  
E: scs@kjk.com; kws@kjk.com

\*Admitted Pro Hac Vice

*/s/ Jaren D. Wilcoxson (via email consent)*

Jaren D. Wilcoxson (BBO #637865)  
MIT OFFICE OF THE GENERAL  
COUNSEL  
105 Broadway, Suite 6201  
Cambridge, Massachusetts 02142  
T: (617) 452-2082  
T: (617) 253-7724  
F: (617) 258-0267  
E: jaren@mit.edu

*Counsel for Defendant Massachusetts  
Institute of Technology*